

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

JANE DOE 2, individually and on behalf of all  
others similarly situated,

*Plaintiff,*

v.

BROWN UNIVERSITY,

*Defendant.*

C.A. No. 1:21-cv-00325-JJM-PAS

KATIANA SOENEN,

*Plaintiff,*

v.

BROWN UNIVERSITY,

*Defendant*

C.A. No. 1:23-cv-00046-JJM-PAS

TAJA-HIRATA-EPSTEIN,

*Plaintiff,*

v.

BROWN UNIVERSITY,

*Defendant.*

C.A. No. 1:23-cv-00047-JJM-PAS

EMMA DENNIS-KNIERIEM,

*Plaintiff,*

v.

BROWN UNIVERSITY,

*Defendant.*

C.A. No. 1:23-cv-00048-JJM-PAS

JANE DOE 2,

*Plaintiff,*

v.

BROWN UNIVERSITY,

*Defendant.*

C.A. No. 1:23-cv-00051-JJM-PAS

**PLAINTIFFS' MOTION FOR ENTRY OF PROPOSED REVISED CASE  
SCHEDULING ORDER**

Plaintiff Jane Doe 2, on behalf of herself and the proposed Class, and Plaintiffs Katiana Soenen, Taja Hirata-Epstein, Emma Dennis-Knieriem, and Jane Doe 2 (in each of their individual capacities) (and, collectively “Plaintiffs” and each a “Plaintiff”), by and through their undersigned counsel, respectfully submit this Motion for Entry of Proposed Revised Case Scheduling Order (the “Motion”) requesting that this Honorable Court enter a Revised Case Scheduling Order, as set forth immediately below, providing amended deadlines as follows:

With respect to the Class Certification:

Discovery or Pleading Title	Current Deadlines	Proposed Dates
Completion date for Class Discovery	June 2, 2023	September 29, 2023
Plaintiff's Motion and Memorandum for Class Certification	June 16, 2023	October 13, 2023
Defendant's objection, if any:	June 30, 2023	October 27, 2023

Plaintiff's Reply	July 7, 2023	November 3, 2023
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With respect to the related individual claims of Plaintiffs Katiana Soenen (Case No. 1:23-cv-00046), Taja Hirata-Epstein (Case No. 1:23-cv-00047), Emma Dennis-Knieriemi (Case No. 1:23-cv-00048), and Jane Doe 2 (Case No. 1:23-cv-00051) (collectively, the "Related Individual Actions"):

Discovery or Pleading Title	Current Deadlines	Proposed Dates
Completion date for Fact Discovery in all Related Individual Actions	August 7, 2023	November 10, 2023

In support of the proposed revised deadlines submitted above, Plaintiffs provide the following:

1. Plaintiffs submit this Motion pursuant to the Court's communication of June 7, 2023, denying the parties' Joint Motion for Scheduling Conference and Deadline Abeyance (ECF No. 59) as moot, and in lieu requesting that the parties meet and confer and e-mail the Court with new proposed deadlines or file an applicable motion.

2. On June 15, 2023, the parties met and conferred (the "Meet and Confer") regarding the expected length of time for completion of class discovery and related pleadings and the close of fact discovery in all Related Individual Actions. The parties agreed that class discovery and related pleadings and fact discovery in the Related Individual Actions cannot reasonably be completed in the time allotted under the February 7, 2023 Text Class Scheduling Order and the February 7, 2023 Pretrial Scheduling Order (ECF No. 56), but differ in opinion as to what new extended dates should apply.

3. During the Meet and Confer, counsel for Defendant Brown University ("Brown" or "Defendant") expressed that Brown could not agree to new case management deadlines at this

time given impending changes to the federally issued Title IX regulations, which revisions are expected to be issued in or around October 2023.<sup>1</sup>

4. Given the foregoing, this Court's June 7, 2023 instruction, and the parties' inability to reach agreement on amended case deadlines, Plaintiffs submit this Motion with Plaintiffs' proposed amended case deadlines.<sup>2</sup>

5. The circumstances set forth herein meet the standard for an extension of deadlines.

6. Moreover, no party is prejudiced by this request.

7. Accordingly, Plaintiffs respectfully request that the Court grant this Motion.

**WHEREFORE**, Plaintiffs respectfully request that this Court grant this Motion in its entirety and award such further relief as deemed appropriate.

Dated: June 16, 2023

Respectfully submitted,

**GRANT & EISENHOFER P.A.**

/s/ Irene R. Lax

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<sup>1</sup> See, e.g., Department of Education, "HomeRoom: The Official Blog of the U.S. Department of Education," available at <https://blog.ed.gov/2023/05/a-timing-update-on-title-ix-rulemaking/> (last accessed June 15, 2023).

<sup>2</sup> In the alternative, Plaintiffs reiterate their request for a scheduling conference with the Court to discuss the proposed deadlines articulated herein for the same reasons as set forth in the Joint Motion for Scheduling Conference and Deadline Abeyance (ECF No. 59).

**GRANT & EISENHOFER P.A.**

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*ATTORNEYS FOR PLAINTIFFS AND THE  
PROPOSED CLASS*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of **PLAINTIFFS' MOTION FOR ENTRY OF PROPOSED REVISED CASE SCHEDULING ORDER** was filed and served electronically through the Court's CM/ECM system on the following counsel of record:

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*Counsel for Defendant, Brown University*

Dated: June 16, 2023

By: /s/ Irene R. Lax  
Irene R. Lax